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January 6, 2020

VIA ELECTRONIC MAIL

Honorable Michael B. Kaplan, U.S.B.J.
United States Bankruptcy Court for the District of New Jersey
Clarkson S. Fisher U.S. Courthouse, 2nd Floor
402 East State Street
Trenton, NJ 08608

**Re: Hollister Construction Services, LLC
Case No. 19-27439 (MBK)
Objection to Newark Warehouse Urban Renewal, LLC Application to Shorten
Time
Docket No. 741**

Dear Judge Kaplan:

This firm is counsel to Hollister Construction Services, LLC, the debtor and debtor-in-possession (the “Debtor”) in the above-referenced case. Further to our call this afternoon with Your Honor’s law clerk, Alexandra Grant, the Debtor objects to the *Motion of Newark Warehouse Urban Renewal, LLC and Newark Warehouse Redevelopment Company, LLC Determining that Certain Parties Have Violated the Automatic Stay, That Certain Asserted Liens Filed Post-Petition Are Void Ab Initio, Confirming the Applicability of the Automatic Stay to The Pending Construction Lien Litigations and For Related Relief* [Docket no. 740] (the “NWR Motion”), and the related Application For Order Shortening Time on the NWR Motion [Docket no. 741].

The Debtor objects to the Application to Shorten Time and NWR’s request that this Court schedule a hearing on the NWR Motion on January 9, 2019. The NWR Motion raises substantive issues that impact the Debtor as well as numerous non-debtor parties who will, in all likelihood, not even see the NWR Motion until Wednesday, January 8, 2020. Given that the NWR entities sought and obtained an order terminating the Debtor’s contract with the NWR entities on October 11, 2019 [Docket No. 303], there is simply no emergency that now justifies a hearing on the NWR Motion on less than two business days’ notice to the parties who will be affected by the NWR Motion. Accordingly, the Debtor submits that the NWR Motion should not be heard on January 9, 2020 and should be scheduled for a hearing according to the Court’s normal motion calendar for a date that is twenty-one (21) days from today.

In the alternative, as Your Honor is aware, there are hearings scheduled in this case on January 16, 2020 and on January 23, 2020. The Debtor respectfully requests that the Order Shortening Time that was entered this afternoon at Docket No. 742 be modified and that the hearing on the

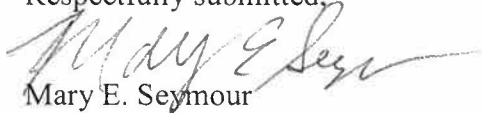
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NWR Motion be rescheduled for the January 23, 2020 hearing date. This will allow the Debtor and all non-debtor parties sufficient and appropriate time to review the NWR Motion and prepare and file objections to same.

We are available at the Court's convenience should Your Honor have any questions regarding the Debtor's objection and request that the hearing on the NWR Motion be rescheduled.

Respectfully submitted,



Mary E. Seymour

MES/bsr

Enclosures

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